

REMARKS

I. Summary of Reply

Applicants have amended claim 58 to correct a clerical error.

The Examiner's rejections are respectfully traversed.

II. Rejection under 35 U.S.C. § 103(a)

The claimed invention is directed to techniques for displaying advertisements to a user. Applicants' independent claim 1, for example, describes the feature of "determining, based on. . . viewer profile information, supplemental advertisement information," and each of applicants' other independent claims, i.e., claims 20, 39, 57, and 58, describes a similar feature.

Applicants submit that independent claims 1, 20, 39, 57, and 58 are patentable over the combination of Ellis et al. U.S. Patent Application Pub. 2008/0184315 ("Ellis") and Schein et al. U.S. Patent Application Pub. 2003/0005445 ("Schein") at least because disclosure cannot be found in the portions of these references cited by the Examiner to show "determining, based on . . . viewer profile information, supplemental advertisement information," as in applicants' claims.

The Examiner cites an embodiment of Ellis as allegedly showing this feature which describes that a "commercial advertisement" is displayed with the message "Press * to receive a brochure describing this product," and in which a user's "name and address" are available (see *Office Action*, page 3, lines 7-20 and page 5, line 21 through page 6, line 3 and *Ellis*, paragraph 230). In particular, the Examiner appears to interpret Ellis's "message" as equivalent to applicants' "supplemental advertisement information" and Ellis's description

of a user's "name and address" as equivalent to applicants' "viewer profile information." Applicants do not necessarily agree with this interpretation. However, even assuming that this interpretation is correct, disclosure still cannot be found in the cited portion of Ellis for determining the message (i.e., the alleged "supplemental advertisement information") based on the user's "name and address" (i.e., the alleged "viewer profile information"), as in applicants' claims. Instead, the portion of Ellis cited by the Examiner describes that the user's "name and address" are accessed or obtained after the displayed "message" is selected by a user, and so it follows that the initial display of the "message" is independent of the user's "name and address." In contrast, applicants' claims describe determining supplemental advertisement information based on viewer profile information. Therefore, for at least these reasons, disclosure cannot be found in the cited portion of Ellis to show the above-described feature of applicants' claims.

Schein was cited by the Examiner as showing elements of applicants' claims that are not present in the above-described feature. Accordingly, applicants' respectfully submit that disclosure also cannot be found in the cited portion of Schein to show the above-described feature of applicants' amended claims.

Moreover, because disclosure cannot be found in the cited portions of either Ellis or Schein for the above-described feature of applicants' claims, the combination of these portions of Ellis and Schein do not show or render obvious applicants' claims 1, 20, 39, 57, and 58. Applicants respectfully request therefore that the rejection of claims 1, 20, 39, 57, and 58, and all of their dependent claims, under 35 U.S.C. § 103(a) be withdrawn.

III. Conclusion

The foregoing demonstrates that this application, as amended, is in condition for allowance. Reconsideration, entry of the proposed amendments, and prompt allowance of this application, are accordingly respectfully requested.

Respectfully submitted,

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